APPLICATION FOR AN ORDER GRANTING LEAVE TO FILE DOCUMENTS UNDER SEAL

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## TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN: 1 2 **NOTICE IS HEREBY GIVEN** that in accordance with Local Rule 79-5.1, 3 Defendants Countrywide Financial Corporation, Countrywide Securities Corporation, Countrywide Capital Markets, LLC, Countrywide Home Loans, Inc., CWALT, Inc., 4 CWABS, Inc., CWMBS, Inc., and CWHEQ, Inc. ("Countrywide") will and hereby do 5 6 apply for an order permitting them to file the Joint Stipulation, dated March 26, 2013 7 ("Stipulation"), [Proposed] Order Granting Joint Stipulation ("Proposed Order"), and 8 Declaration in Support of Joint Stipulation ("Declaration") under seal. 9 The Stipulation, Proposed Order, and Declaration contain highly confidential 10 information. Plaintiffs in the above-captioned cases do not object to the Stipulation. 11 Proposed Order, and Declaration being filed under seal. 12 For this reason, Countrywide respectfully requests that the Court order these 13 documents filed under seal in their entirety. 14 15 Dated: March 26, 2013 Respectfully submitted, 16 GOODWIN PROCTER LLP 17 Brian E. Pastuszenski (pro hac vice) / Inez H. Friedman-Boyce (pro hac vice) Brian C. Devine (State Bar No. 222240) 18 19 **Exchange Place** Boston, MA 02109-2802 Tel.: 617-570-1000 20 Fax: 617-570-1231 21 John O. Farley (pro hac vice) 22 620 Eighth Avenue New York, NY 10018 23 Tel.: 212-813-8800 Fax: 212-355-3333 24 Attorneys for Defendants 25 Countrywide Financial Corporation, Countrywide Securities Corporation, Countrywide Capital 26 Markets, LLC, Countrywide Home Loans, Inc., CWALT, Inc., CWABS, Inc., CWMBS, Inc., and 27 CWHEQ, Inc. 28